

# Presentation to the State Members of the Federal-State Joint Board on Universal Service

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Presentation to Commissioner Bob Rowe

CC Docket No. 96-45  
Eligibility for Lifeline and Link-Up Services

National Association of State Utility Consumer Advocates  
United States Conference of Catholic Bishops, et al.  
Civil Rights Forum on Communications Policy  
AARP

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# Keys to increasing Lifeline subscription

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- Adding an income standard to existing federal eligibility rules
- Setting minimum eligibility standards for states administering the federal Lifeline program
- Using automatic enrollment to increase subscription
- Increasing emphasis on education and outreach by adding specific objectives to the Commission's rules

# Lifeline subscription and effectiveness will increase with changes in eligibility standards

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- Existing eligibility standards for federal Lifeline vary widely among the states
- Lifeline subscription is especially low in some states with narrow eligibility standards
- The shrinking rolls of public assistance programs are reducing the number of eligible consumers
- Stigma of public assistance keeps some consumers from qualifying for Lifeline under the existing “programmatic” standard

# The FCC should add an income-based eligibility standard for Lifeline and Link-Up

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- In addition to the existing “programmatic” standards, the FCC should add an income standard of 150% of the federal poverty guidelines for household income
- This modified federal eligibility standard should be the minimum standard for the federal programs; states could seek a waiver of the standard for good cause
- States should be able to expand eligibility beyond the federal minimum standard and could use different a different standard for state Lifeline programs

# Automatic enrollment can be an effective means to increase Lifeline participation

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- **AE** will increase Lifeline participation quickly and efficiently
- States' experience shows **AE** programs can successfully integrate state agency efforts
- Concerns about consumer privacy have been successfully addressed
  - Limits on use of data
  - Opportunities for consumers to decline Lifeline

# Lifeline rules should permit self-certification of income eligibility

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- Self-certification is a cost-effective means of qualifying Lifeline recipients
  - applicant signs a form, under penalty of perjury, that certifies household income level
- Effectiveness of a self-certification program can be checked with random spot audits
- Experience with self-certification shows that consumer fraud is not a significant problem

# Recommendations

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- The FCC should adopt a flexible national standard for Lifeline and Link-Up eligibility
  - Add an income standard set at 150% of federal poverty guidelines
  - Make the standard a minimum for federal programs, with temporary waivers for good cause
- The FCC should require carriers to use automatic enrollment to increase Lifeline participation
- The FCC's rules should require carriers and states to use self-certification of eligibility (with sample audits)

# Recommendations, cont'd.

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- The FCC should encourage improved outreach efforts by adding specific objectives to its rules
- The FCC should make other changes in its Lifeline rules:
  - State-level Consumer Advisory Boards should be used to develop and improve outreach efforts
  - Carriers should be required to give separate notice of overdue local bills in a termination notice
  - Carriers should be discouraged from marketing vertical services to Lifeline recipients